

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
Northern Division

GREAT LAKES EXPLORATION)
GROUP LLC)
)
Plaintiff,)
)
v.)
)
The Unidentified, Wrecked and)
Abandoned Sailing Vessel, her)
engines, tackle, apparel,)
appurtenances, cargo, etc.)
located within a circle having)
a radius of 3.5 statute miles, whose)
center point is at coordinates)
45° 32.8' North latitude and 86° 41.5')
West longitude,)
)
In Rem)
)
Defendant.)

Civil Action No. _____

Robert Holmes Bell
Chief, U.S. District Judge

1 : 04 CV 0375

U.S. DISTRICT COURT
WESTERN DISTRICT MICH
04/28/2004

MOTION FOR IN CAMERA HEARING AND SUPPORTING BRIEF

COMES NOW Plaintiff, Great Lakes Exploration Group LLC, by counsel, and
for its motion for an *in camera* hearing herein respectfully states as follows:

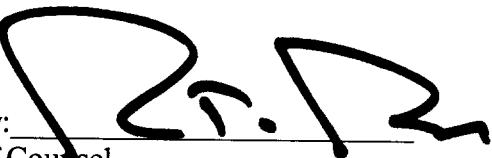
1. Plaintiff is in the process of conducting recovery of the Defendant
shipwreck which is the subject of this suit.
2. Plaintiff desires to keep the Court fully informed as to the details, nature
and extent of such recovery operations.
3. Plaintiff desires to arrange with the Court a pre-arrest hearing pursuant to
Supplemental Rule C (3), Fed. R. Civ. Proc.

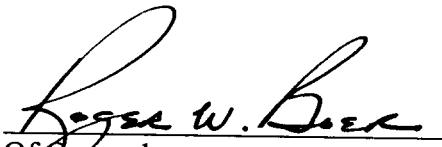
4. Much of the information to be divulged to the Court is confidential, proprietary, trade secret information and/or otherwise in need of protection from public disclosure.

5. Public disclosure of such information would result in substantial loss of proprietary rights of the Plaintiff, would potentially interfere with Plaintiff's conduct of recovery operations, and could have potentially adverse consequences for the safety of life and property at sea.

Accordingly, Plaintiff prays this Court to allow the disclosure *in camera* of the details of Plaintiff's recovery operations.

Respectfully submitted,
GREAT LAKES EXPLORATION GROUP LLC

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